

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION

United States of America,

vs.

Case No. 2:19-cr-00235  
Judge John T. Copenhaver, Jr.

Julie M. Wheeler.

**Unopposed Motion to Permit Defendant to Travel**

Now comes Julie M. Wheeler, who is currently on bond pending her sentencing scheduled for May 20, 2020, by counsel, Roger L. Lambert, and hereby moves for permission to travel outside the Southern District of West Virginia from March 14, 2020 to March 21, 2020. Specifically, Wheeler requests permission to travel by air to the Middle District of Florida, where she will accompany her son, who is applying for admission to the University of Southern Florida in Tampa and desires to visit the campus. Wheeler and her son intend to fly from Beckley, West Virginia to Orlando, Florida, and then onto Tampa, Florida by rental car. She intends to return to West Virginia in the same manner. Wheeler would further advise the Court that she does not possess a passport.

AUSA Erik Goes and Wheeler's supervising probation officer, Heather Edwards, have advised counsel that they do not object to this Motion.

**JULIE M. WHEELER**  
By Counsel,

/s/ Roger L. Lambert  
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**CERTIFICATE OF SERVICE**

I, ROGER L. LAMBERT, counsel for Julie M. Wheeler, do hereby certify that service of the foregoing *Unopposed Motion to Permit Defendant to Travel* was made by hand-delivery, facsimile transmission, email, electronic filing or first class mail, postage prepaid to the following, on February 21, 2020.

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/s/ Roger L. Lambert  
ROGER L. LAMBERT